

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

KENDRICK SLAUGHTER PLAINTIFF

VS. NO. 4:05CV162-L-R

COUNTY OF NOXUBEE, MS, ET AL DEFENDANTS

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DEPOSITION OF BERTHA HARPER

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TAKEN AT THE INSTANCE OF THE PLAINTIFF  
IN THE LAW OFFICES OF DUNN AND HEMPHILL  
215 5TH STREET, COLUMBUS, MISSISSIPPI  
ON FEBRUARY 26, 2007, BEGINNING AT 11:22 A.M.

APPEARANCES NOTED HEREIN

Reported by: REGINA D. RUSSELL, CSR 1110

ADVANCED COURT REPORTING  
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**COPY**

1 about it.

2 Q. Okay. One moment. When she asked you to  
3 get in the car or told you to get in the car, what  
4 did she say to make you want to get in the car?

5 A. She said I'm going to take y'all down to  
6 the jailhouse. That's what she said. And when she  
7 got down there, she said y'all got to sign some  
8 papers. I was like, I got to sign some paper for  
9 what?

10 Q. Okay. One moment. One moment. Okay.  
11 When she took you down to the jailhouse, what did you  
12 say?

13 A. She said I'm going take you to sign some  
14 papers.

15 Q. Take you to sign some papers?

16 A. I said on who? She said Shawn Slaughter.  
17 He talking about slapping you.

18 Q. Stabbing you?

19 A. No. Slapping me.

20 Q. Slapping you.

21 A. I said no, he didn't. He did not do  
22 nothing to me.

23 Q. Okay. You said that -- are you saying that  
24 Patsy told you --

25 A. Yes, ma'am.

1 Q. Okay. Did you tell her -- did you tell  
2 Patsy anything else when she gave more information?

3 A. No.

4 Q. What was she saying?

5 A. She didn't say nothing else then.

6 Q. Well, it's a long statement.

7 A. Well, he made the paper. But all she said  
8 I left out of there.

9 Q. You left the room?

10 A. I left the room. She stayed. I don't know  
11 what else she said when I left out now.

12 Q. Okay. She testified that you left the  
13 room -- that you and Mable left the room.

14 A. I did. I don't know what else she talked  
15 about when I left out of there now. I don't know  
16 what else she said.

17 Q. So when you left the room, had Terry  
18 finished writing?

19 A. Yes. He got through and I left out.

20 Q. And did you sign this before you left the  
21 room?

22 A. Yes, I did.

23 Q. Did you go back in the room?

24 A. I didn't go back.

25 Q. So you signed this before you left the

1 room?

2 A. Yes, I did.

3 Q. Did he read this to you?

4 A. He did read it. All I did was hear his  
5 reading. I don't know what all he said now.

6 Q. Okay. Say that again.

7 A. I don't know what all he said now.

8 Q. Did he read this --

9 A. Yes, he did.

10 Q. Did he say he read this document to you?

11 A. He was reading everything on there,  
12 everything. But I don't know what that meant because  
13 I ain't never been in it and I don't know.

14 Q. Okay. Did he read the same information to  
15 you about bringing --

16 A. No. He was reading something else but I  
17 don't know what it was now.

18 Q. Let me try to get this out. Did he give  
19 you -- when he read this information purportedly from  
20 this document, did he say the same thing that I said  
21 when I read it to you?

22 A. No.

23 Q. Okay. Do you recall what he said?

24 A. No.

25 Q. Was it a complaint against Kendrick

1 was preparing that statement?

2 MS. JOHNSON: Object to form.

3 A. She was talking real slow and then she  
4 would talk loud. I couldn't understand what all she  
5 was saying.

6 Q. Okay. She would talk slow and she would  
7 talk loud?

8 A. Uh-huh (Indicating yes).

9 Q. And you didn't understand what she was  
10 talking about?

11 A. I sure didn't. I'm not going to tell no  
12 story.

13 Q. Okay. Was it your understanding that what  
14 she was saying was what Terry Grassaree was putting  
15 on the paper?

16 A. I don't understand what he was doing.

17 Q. All right. Did Mable say anything?

18 A. She was saying this stuff.

19 Q. What all did Mable say?

20 A. I don't know what all she was saying.  
21 Because I had done got through with mine. And she  
22 had Mable sign the papers then.

23 Q. Okay. Was there a period of time when  
24 Mable and Patsy were talking and Terry Grassaree was  
25 taking everything down?

1 Q. Have you ever seen Terry Grassaree with a  
2 blackjack?

3 A. No.

4 Q. When I watch the police movies on TV, they  
5 got one of them sticks --

6 A. I ain't seen that.

7 Q. -- about this long that has a handle on the  
8 side. That's what I call a night stick. You know  
9 what I mean?

10 A. Yeah, I know what you call a night stick.  
11 I ain't going to say I seen him with one. I ain't  
12 going to get myself in nothing like this. I don't  
13 know nothing about that.

14 Q. You've never seen Terry Grassaree with a  
15 night stick?

16 A. No. No.

17 Q. Okay. Did you ever tell Terry Grassaree  
18 that Ms. Roby was trying to get you to sign papers on  
19 Kendrick's lawyer but that you didn't want to?

20 A. No.

21 Q. So that day at the sheriff's department you  
22 didn't tell him that you don't have any complaints  
23 against Kendrick's lawyer?

24 A. No, I ain't said it.

25 MS. JOHNSON: Object to the form.

1 Q. (Mr. Wilson) I'm sorry, I didn't hear your  
2 answer.

3 A. No.

4 Q. You didn't tell him that Ms. Roby was  
5 trying to get you to sign papers and that those  
6 things weren't true?

7 A. No.

8 MS. JOHNSON: Object to the form.

9 Q. (Mr. Wilson) Do you remember anything that  
10 Terry Grassaree said to you?

11 A. No. Unh-unh (Indicating no).

12 Q. Do you remember anything that you overheard  
13 him say?

14 A. Unh-unh (Indicating no).

15 Q. Is that a no?

16 A. No.

17 Q. And do you remember, was Albert Walker ever  
18 there?

19 A. I didn't see no Albert Walker down there.

20 Q. He didn't have anything to do with this  
21 stuff?

22 A. No. I ain't seen him in there.

23 MR. WILSON: Okay. Thank you for your  
24 time, Ms. Harper. That's all the questions I have.

25 EXAMINATION